1 Jason Harrow James Crooks (Cal. Bar No. 308560) (pro hac vice) 2 GERSTEIN HARROW LLP Michael Lieberman 12100 Wilshire Blvd. Ste. 800 (pro hac vice) 3 Los Angeles, CA 90025 FAIRMARK PARTNERS, LLP 1001 G Street NW, Suite 400E jason@gerstein-harrow.com 4 (323) 744-5293 Washington, DC 20001 5 jamie@fairmarklaw.com michael@fairmarklaw.com 6 (619) 507-4182 Charles Gerstein 7 (pro hac vice) 8 **Emily Gerrick** (pro hac vice forthcoming) 9 GERSTEIN HARROW LLP 1001 G Street NW, Suite 400E 10 Washington, DC 20001 charlie@gerstein-harrow.com 11 (202) 670-4809 12 13 UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA 14 SAN FRANCISCO DIVISION 15 ANDREW SAMUELS, on behalf of himself Case No. 3:23-cv-06492 16 and all others similarly situated, 17 JOINT STIPULATION TO CONTINUE Plaintiff, CASE MANAGEMENT CONFERENCE 18 AND JOINT REPORT DEADLINE VS. 19 **CLASS ACTION** LIDO DAO, a general partnership; AH 20 CAPITAL MANAGEMENT, LLC; JURY TRIAL DEMANDED 21 PARADIGM OPERATIONS LP; DRAGONFLY DIGITAL MANAGEMENT Before the Hon. Vince Chhabria 22 LLC; ROBOT VENTURES LP, 23 Defendants. 24 25 26 27 28

JOINT STIPULATION

Plaintiff Andrew Samuels and Defendants AH Capital Management LLC, Paradigm Operations LP, and Dragonfly Digital Management LLC ("Stipulating Defendants") jointly request that this Court continue the initial case management conference to Friday, January 3, 2025 at 10:00 AM, with a joint case management statement deadline of December 20, 2024.

On November 18, 2024, this Court set the initial case management conference for December 6, 2024, at 10:00 AM, with a joint case management statement due on December 3, 2024. When this Court chose that date, it fell about a week after Defendants' answer deadline in this matter. By stipulation, Plaintiff Andrew Samuels and Defendants AH Capital Management LLC, Paradigm Operations LP, and Dragonfly Digital Management LLC ("Stipulating Defendants") extended Stipulating Defendants' answer deadline to December 18. See ECF No. 118.

Plaintiff and Stipulating Defendants now respectfully request that this Court continue the initial case management conference to Friday, January 3, at 10:00 AM, with a joint case management statement deadline of December 20. Plaintiff and Stipulating Defendants agree that conducting the case-management conference and the parties' initial discovery conference after Defendants' answer deadline would reduce the potential for duplicative work and ensure that the case schedule accounts for any counterclaims or motions the parties are currently contemplating. January 3 is also the earliest practicable conference date for all involved, given the number of different attorneys at different law firms involved, some of whom have different but overlapping vacation and work schedules around the end of the year and the winter holidays. See Declaration of Jason Harrow ¶ 2.

PURSUANT TO STIPULATION, IT IS SO ORDERED that the initial case management conference to Friday, January 10, 2025 at 10:00 AM, with a joint case management statement deadline of January 3, 2024.

Dated: November 27, 2024

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The Hon.

IT IS SO ORDERED

AS MODIFIED

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